

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ,  
MARCUS MARTIN, NATALIE ROMERO,  
CHELSEA ALVARADO, JOHN DOE, and  
THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCHE”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**MOTION SEEKING LEAVE TO DEPOSE CHRISTOPHER CANTWELL**

Pursuant to Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure, Plaintiffs respectfully request leave to depose Defendant and federal inmate Christopher Cantwell, who is currently incarcerated in the Strafford County Department of Corrections, 266 County Farm Road, Dover, New Hampshire 03820. Mr. Cantwell is currently detained in the District of New Hampshire pending a trial scheduled to begin on September 22, 2020. See U.S.A. v. Christopher Cantwell, 1:20-cr-00006-PB (D.N.H.).

Consistent with this Court's July 1, 2020 Order (Doc. No. 791), Plaintiffs seek to depose Mr. Cantwell, an incarcerated party, after the close of fact discovery. Plaintiffs communicated with Lt. Laura Noseworthy at the Strafford County Department of Corrections and confirmed that the facility can accommodate a deposition of Mr. Cantwell to be conducted remotely.

For the Court's convenience, Plaintiffs have attached a proposed order granting this Motion.

Date: September 3, 2020

Respectfully submitted,

/s/ Michael L. Bloch

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### CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on September 3, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

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